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Attorneys for Plaintiff Shirley Lindsay

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Shirley Lindsay,)	Case No.: 2:15-CV-01719-FMO-JC
Plaintiff,)	
)	PLAINTIFF'S PRETRIAL DISCLOSURES
v.)	
Best California Gas, LTD., a California)	Final Pretrial Conference: April 22, 2016
Limited Partnership;)	Time: 10:00 a.m.
Platinum Springs, LLC, a California)	
Limited Liability Company;)	
Harsico, LLC, a California Limited Liability)	Complaint Filed: March 10, 2015
Company; and Does 1-10,)	Trial Date: May 10, 2016
Defendants.)	
)	
)	
)	Honorable Judge Fernando M. Olguin
)	

Pursuant to FRCP 26(a)(3) and Local Rules 16-2.3 and 16-2.4, the plaintiff hereby submits her Pretrial Disclosures. Discovery and investigation is ongoing and Plaintiff reserves the right to revise, withdraw, amend or modify and/or supplement these disclosures should new information become available.

1 **1. WITNESSES PLAINTIFF EXPECTS TO PRESENT**

2 Shirley Lindsay- 7117 Alvern Street Apt. E-307, Los Angeles, CA 90045 - (213)354-
3 5611

4 Evens Louis- 5351 Lasher Road, Calabasas, CA 91302 - (818)321-6645

5 Pierre Daniel- P.O. Box 11935, Marina Del Rey, CA 90295

6 LaShawn Hodge- 5001 Wilshire Blvd. #112-324, Los Angeles, CA 90036

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8 **2. WITNESSES PLAINTIFF EXPECTS TO PRESENT BY DEPOSITION**

9 None at this time.

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11 **3 EXHIBITS PLAINTIFF EXPECTS TO OFFER**

- 12 • Plaintiff's photographs of exterior of Defendant's business, taken February 25, 2015.
- 13 • Copy of photographs of the parking taken by Plaintiff on her July 4, 2015 visit to the Gas
- 14 Station.
- 15 • Copy of photographs of the parking at the Gas Station, provided by Defendants.
- 16 • Copy of receipt from Plaintiff's August 23, 2015 visit to the Gas Station.
- 17 • Copy of a satellite image of the parking at the Gas Station located at or about 6000
- 18 Canoga Avenue, Woodland Hills, California.

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20 Should the need arise, Plaintiff may offer:

- 21 • Copy of Corporation Grant Deed by and between Exxon Corporation and Best California
- 22 Gas Ltd. For the property located at or about 6000 Canoga Avenue, Woodland Hills,
- 23 California, provided by Defendant.
- 24 • Copy of Retail Facility Lease between Tesoro Refining & Marketing Company, LLC and
- 25 Harisco, LLC (including Exhibits A [Authorized Ancillary Business Uses of the
- 26 Premises], B [Lessee's Maintenance Obligations] and C [Addendum to Retail Facility
- 27 Lease] thereto)
- 28

- 1 • Plaintiff's Requests For Admission, Set One, propounded on Defendant Best California
- 2 Gas, LTD on May 26, 2015, and associated Verified Supplemental Responses
- 3 • Plaintiff's Requests For Production of Documents, Set One, propounded on Defendant
- 4 Best California Gas, LTD on May 26, 2015, and associated Verified Supplemental
- 5 Responses
- 6 • Plaintiff's Special Interrogatories, Set One, propounded on Defendant Best California
- 7 Gas, LTD on May 26, 2015, and associated Verified Supplemental Responses
- 8 • Plaintiff's Requests For Admission, Set One, propounded on Defendant Platinum
- 9 Springs, LLC on May 26, 2015, and associated Verified Supplemental Responses
- 10 • Plaintiff's Requests For Production of Documents, Set One, propounded on Defendant
- 11 Platinum Springs, LLC on May 26, 2015, and associated Verified Supplemental
- 12 Responses
- 13 • Plaintiff's Special Interrogatories, Set One, propounded on Defendant Platinum Springs,
- 14 LLC on May 26, 2015, and associated Verified Supplemental Responses
- 15 • Plaintiff's Requests For Admission, Set One, propounded on Defendant Harsico, LLC on
- 16 May 26, 2015, and associated Verified Responses
- 17 • Plaintiff's Requests For Production of Documents, Set One, propounded on Defendant
- 18 Harsico, LLC on May 26, 2015, and associated Verified Responses
- 19 • Plaintiff's Special Interrogatories, Set One, propounded on Defendant Harsico, LLC on
- 20 May 26, 2015, and associated Verified Responses

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1 Plaintiff reserves the right to revise, withdraw and/or to supplement these Pretrial
2 Disclosures as necessary and produce additional witness and exhibits who may be relevant to
3 this case as they become known during the course of this litigation and as permitted by
4 Fed.R.Civ.P. 26(e).

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6 Dated: April 8, 2016

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8 By: /s/ Christina Sosa

9 CHRISTINA SOSA
10 Attorneys for Plaintiff
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